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DD/S

56-2057

COORDINATION OF REGULATIONS

I. BACKGROUND:

The coordination of Agency administrative regulations has been a very lengthy, repetitious, and tedious process. Some of the reasons for this situation are:

A. Administrative regulations in draft or unstaffed form have been submitted for coordination to be found later to require extensive revision and re-coordination.

B. DD/P coordination policy appears to be to permit all DD/P components to review and comment upon all proposed regulations. This greatly increases the necessary coordination period due to the varying workloads in the coordinating offices and the priority of attention ascribed by each to regulation review.

C. DD/P coordinating offices often do not restrict their review and comments to the pertinent and significant aspects of regulations. The resultant comments are so diverse, editorial in nature, and often irrelevant that an unreasonable effort must be made to isolate the significant comments and disagreements.

II. PROPOSAL:

To improve this situation, the following is proposed:

A. That the DD/P be asked to designate an official to review administrative-type regulations with the initiating office during the developmental period. The purpose of this review is to detect at the earliest possible date policies or procedures which would impair operational effectiveness, unnecessarily impinge upon delegations of authority to DD/P officials, or endanger security.

B. DD/S officials should be directed to staff out their draft regulations with DD/S components and staffs concerned before releasing the regulation to the DD/P for formal coordination. (Such staffing to include the DD/P representative proposed in the above).

C. The DD/P should be asked to tighten up his internal coordination process by the following measures:

1. Establishing a DD/P Coordination Board for the review of proposed administrative regulations. The Board should consist of selected individuals knowledgeable as to both operational and administrative problems of the Agency. The Board should supercede the "across the boards" coordination system presently effected in DD/P.

2. Establishing a deadline for the review and comments on each

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regulation and providing for concerted action by the Board as a body to reduce the views of the individual Board members to a consolidated DD/P position.

3. Instructing the DD/P Coordination Board to restrict its views and comments to the following questions:

- a. Is the regulation useful and/or necessary?
- b. Does the regulation unnecessarily impinge upon the operational responsibilities of DD/P officials?
- c. Are the procedural requirements reasonable relative to the policy at issue?
- d. Is the regulation understandable, concise, and in suitable editorial form?

III. CONCLUSION:

It is believed that the adoption of the above proposal or some variation thereof will greatly shorten the coordination process and, at the same time, improve the quality of Agency regulatory issuances.